

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

ROBERT HARRIS, ET AL.

PLAINTIFFS

VS.

CIVIL ACTION NO.: 3:22-CV-00479-TSL-MTP

SAM DOBBINS, ET AL.

DEFENDANTS

Declaration of Charles Henderson

1. Charles Henderson, am over the age of 18, am of sound mind, and declare as follows:

1. I currently serve as Lexington, Mississippi's interim police chief. I first began working for the Lexington Police Department around 2015. I am a black male.

2. At the time Sam Dobbins was appointed police chief in 2021, crime in Lexington was rampant. Gunshots commonly were heard throughout the day and at night. Cars would drag race in the city limits without regard for traffic laws or citizen safety.

3. All current members of the Lexington Police Department are black.

4. It is my understanding that Robert Earl Harris is a convicted felon and has served time for sexual assault.

5. Both Robert and Darious Harris have pending felonies that have not yet been presented to a grand jury related to the December 31, 2021 incident.

6. It has been my experience that misdemeanor charges are not prosecuted prior to presentment of felony charges.

7. In relation to the March 6, 2022 incident, Peter Reeves was convicted of two misdemeanors, and the felony narcotics charge was not pursued.

8. It is my understand that Malcom Stewart is a convicted felon who has served time for, among other things, burglary, selling cocaine, and driving under the influence.

Exhibit "B"

9. In relation to the September 2019 incident, Stewart was convicted of misdemeanor offenses.

10. In relation to the June 30, 2022 incident, Stewart was charged with simple assault, obstructing traffic, resisting arrest, possession of stolen property, driving under the influence, switched tag, and failure to comply. The charges remain pending because the felony has not yet been presented to a grand jury.

11. In relation to the June 2022 incident, Eric Redmond was charged with disorderly conduct/failure to comply and resisting arrest. The charges remain pending.

12. To my knowledge, Dobbins has not patrolled Lexington following his termination.


13. Dobbins does not live in Lexington.

14. Jill Jefferson has attended Lexington Municipal Court with members of the media.

15. I am not aware of the Lexington Police Department utilizing vehicle checkpoints for illegal purposes, such as targeting members of a particular race. As interim police chief, I would never condone the use of a checkpoint for such purpose.

16. All of the above is true and correct to the best of my knowledge and belief.

Executed this 7th day of September, 2022.


Charles Henderson